

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Notice of Proposed Rulemaking)	
18 FCC Rcd 13187, 13188 ¶1 (2003))	ET Docket No. 03-137
)	
And)	
)	
Service Rules for the Advanced Wireless Services)	WT Docket No. 12-357
H Block---Implementing Section 6401 of the)	
Middle Class Tax Relief and Job Creation Act of)	
2012 Related to the 1915-1920 MHz and)	
1995-2000 MHz Bands ¶53 footnote 95)	

To: Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Comment Filed by: Charyl Zehfus
N6158 N. 61st Street
Sheboygan, WI 53083
wisconsinmelodygirl@yahoo.com
920-467-4853

March 5, 2013

AFFIDAVIT OF

State of Wisconsin]

Sheboygan County]

I, ___Charyl Zehfus___, attest that my statements are true to the best of my knowledge.

Comment round for ET Docket No. 03-137 and WT Docket No. 12-357.

1. My name is _Charyl Zehfus_ . My address is ____N6158 N. 61st Street,
Sheboygan, Wi 53083_____.

2. I am a retired librarian.

3. Dear Ms. Dortch, FCC Secretary,

This part 3 reply reply goes with my part 2 reply on the same dockets entered March 5. It also addresses some access issues regarding public input, and rationale for an extension of this comment period.

4. In part 2, I told of seeing 10,000 comments on the screen on March 4, most from wireless companies. I no longer can find that list. The comments for 03-137 are back down to nearly 300 at the Express screen. A computer whiz I am not. Could someone at the FCC please let me know how one can get a list of 10,000 comments up? This librarian is mystified. Perhaps a misaimed click could bring up all comments for all dockets under a certain sub-heading, like wireless technology. Please let me know.
5. I am concerned about public accessibility of sending public input to the FCC. People contacted me with difficulties with the screens for both longer uploaded comments/documents and the Express input screens. Some of the people have ADA-recognized Electromagnetic Sensitivity (ES). Being on the computer is difficult for some of them due to the light from the screen and EMF exposure. Multiple busy columns on an input screen can be confusing. The print size for people can make commenting daunting for those who are sight-challenged and others. These individuals need very basic ways to gain access to making comments.
6. I would suggest changing the Express or adding a large print input option that has only the address and comment boxes filling the screen. This input screen should fill the entire page without all that other busy information at the left and on top. These people require very basic input screens so having other information even at the edges

can be confusing and stop them from being able to participate in the comment process.

7. The new large print, unfettered input screen should have large buttons for CONTINUE, SEND, and EDIT. It would use phrases, such as I WANT TO START OVER to take people back to the first screen or the list of dockets. The word “send” would be friendlier to use than “confirm” to some disabled people. Remember, not everyone has the same language skills either.
8. Please also consider adding a separate screen or huge button that allows the public to easily find and select the three ways to send comment, long online format for documents/affidavits, Express/large print format online, and USPS mail option. If a person gets to your Express screen and decides they cannot or do not want to enter there, they should be able to EASILY see where to click to see how to mail in their comment via USPS. This comment send options button ought to not clutter up the Express entry screen, but should be a large button and easy to find for everyone on all screens. I had to really dig to find how to send a snail mail comment. The public deserves an easier way to find out this information.
9. In order to have more time to help people who might have trouble entering comments, and in order to have time to reach more of the stakeholders, disabled people with electromagnetic sensitivity, who are directly impacted by FCC RF standards limits, I had asked Ms. Taylor at the Office of the Secretary if the FCC would please consider extending the time period to comment for both dockets. I was ultimately told they would not do it, and that they never extend comment periods comment on dockets. Yet, I noticed an extension for input granted for another recent docket: WT Docket No. 11-49
Certain Multilateration Location and Monitoring.
10. Here are some quotes from the attached WT docket 11-49 document that would apply to the points I will make about 03-137 and 12-357 public comment extension. The file is attached to this comment from website:

<https://www.fcc.gov/document/comment-deadlines-extended-progenys-test-report>

11. Federal Communications Commission, DA 12-1930

*“Protective Order creates a situation where parties “will effectively be left with only seven business days to review materials and prepare comments.”⁵ The Part 15 Coalition states that **an extension of time is necessary and would be in the public interest***

“[g]iven the complexity and volume of the data and importance of the FCC’s decision

in this proceeding.⁶”

12. **“The Commission’s policy, as set forth in Section 1.46(a) of its rules,¹¹ is that extensions of time are not routinely granted. In the instant case, however, we find that under these particular circumstances granting an extension of the comment and reply comment periods will serve the public interest by allowing all parties additional time to consider issues in the proceeding.** Under the circumstances of this proceeding, we find that the request for ten additional days for filing comments to be reasonable, and we extend the comment period until December 21, 2012. We also **provide ten additional days for filing reply comments** and extend the reply comment deadline until January 11, 2013, which we find to be sufficient for this proceeding.”
13. As per point #11 above, given the complexity and volume of data and importance of the FCC’s decision in 03-137 and 12-357 proceedings an extension of time is necessary and would be IN THE PUBLIC INTEREST.
14. The complexity and volume of data related to 03-137 and 12-357 involve becoming familiar with thousands of scientific studies and expert opinions in order to fully understand the issue and form a comment.
15. The importance of FCC’s decision and actions in 03-137 and 12-357 cannot be over-estimated. It will impact all Americans’ lives because it will determine the levels of exposure to RF radiation they and their families will have.
16. The FCC’s decision may cause people with ADA-recognized Electromagnetic Sensitivity (ES) to lose further access to telecommunications, since they cannot use wireless RF devices.
17. The FCC’s decision will impact individuals’ freedom to say no to having RF utility meters on their own homes. Forcing radiation emitting devices onto homes is unconstitutional. But the FCC’s ruling on safety is used by state public service commissions and utilities to justify forcing smart meters (AMI, AMR, etc.) onto homes even for customers whose doctors have written letters saying they should have non-transmitting analog meters due to health issues.

18. Access issues regarding the confusing online public comment formats and difficulty finding the USPS mail address to send to at the online system are not solved. This instance in particular involves ADA-recognized disabled people trying to enter their comments through unfriendly formats. (please see #5-8 above for details)
19. Another access issue involves the location of the call for public comments for docket 12-357 – briefly announced in the 95th footnote of a docket on technical RF spectrum issues. This is hardly easy to find or even run across for the average person. This obscurity of announcement is another reason to extend the public reply period.
20. Therefore, as per #12 above, **“under these particular circumstances granting an extension of the comment and reply comment periods will serve the public interest by allowing all parties additional time to consider issues in the proceeding.”** Extending the reply comment period for 03-137 and 12-357 would be reasonable and serve the public interest in light of points made above.
21. And by the way, dear Ms. Dortch and FCC, the “one little fact that should change everything” in my part 2 reply still stands. Thank you.

Respectfully submitted by

Charyl Zehfus

N6158 N. 61st Street

Sheboygan, WI 53083

March 5, 2013